

REMARKS

Claims 1 and 4-12 are amended. Claims 1, 4-12, 16-21, and 24-28 are pending. In view of the following remarks, Applicant respectfully requests reconsideration of the rejections.

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§ 101 Rejections

Claims 1, 4-12, 16-21, and 24-28 stand rejected, by the Board, under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter.

Applicant has amended claims 1 and 4-12 to further emphasize their statutory

10 nature. Applicant submits that claims 1, 4-12, 16-21, and 24-28 are in condition for allowance. For the reasons set forth below, Applicant respectfully requests that the rejections of these claims under § 101 be withdrawn.

The Claims

15 **Claim 1** as amended recites a *computer-implemented* method, comprising [added language appears in bold italics]:

- receiving, *with a computing device*, data input through a web page from a client device;
- referencing a declarative module, *embodied on computer storage media associated with the computing device*, to determine a client input security screen to apply to the data input from the client device, wherein the declarative module comprises:
 - a global section that includes at least one client input security screen that applies to any type of client input value; and
 - an individual values section that includes at least one client input security screen that applies to a particular type of client input value; and

- 5 • applying, *using the computing device*, multiple client input security screens to the data input from the client device, including at least one client input security screen from the global section of the declarative module and at least one client input security screen from the individual values section of the declarative module, wherein the client input security screens are distinct from one another, and wherein said act of referencing comprises first using the global section to screen one or more client input values and then using the individual values section to screen at least one of said one or more client input values.

10 In making out the rejection of claim 1, the Board argues that “the disclosed and claimed invention is directed to software per se, abstract ideas, abstract concepts and methodologies and the like” (Decision on Appeal, pg. 5). Applicant respectfully disagrees. Nonetheless, in the interest of advancing prosecution,

15 claim 1 has been amended to further emphasize its statutory nature. Support for the amendments can be found in the Specification, among other places on pg. 9, lines 12-20 and pg. 12, lines 21-24. For the reasons set forth below, Applicant respectfully requests the rejection be withdrawn

 The Board states that “[t]o the extent recited in the claims, the web services, servers, browsers, and clients appear to be software entities in and of themselves and they are not necessarily stated or claimed to be embodied in hardware structure” (Decision on Appeal, pg. 5). Applicant respectfully points out that claim 1 recites “a client device” which is described in the Specification, among other places on pg. 12, lines 21-22: “[c]omputer environment 400 includes a general-purpose computing device in the form of a computer 402. Computer 402 can be, for example, a client 110 or server 102”. Accordingly, a client device is indeed a statutory hardware device.

Furthermore, claim 1 as amended recites “receiving, *with a computing device*” and “applying, *using the computing device*” which ties the claim to a hardware structure. Additionally, claim 1 as amended recites “referencing a declarative module, *embodied on computer storage media associated with the computing device*”. Applicant’s specification describes “computer storage media” on pg. 17, lines 8-16 which is reproduced below for the convenience of the Office.

“Computer storage media” includes volatile and non-volatile, removable and non-removable media implemented in any method or technology for storage of information such as computer readable instructions, data structures, program modules, or other data.
10 Computer storage media includes, but is not limited to, RAM, ROM, EEPROM, flash memory or other memory technology, CD-ROM, digital versatile disks (DVD) or other optical storage, magnetic cassettes, magnetic tape, magnetic disk storage or other magnetic storage devices, or any other medium which can be used to store the desired information and which can be accessed by a computer.
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Computer storage media, as supported by the Specification, is indeed statutory in nature. Accordingly, for all of these reasons, Applicant respectfully
20 requests that the § 101 rejection be withdrawn.

Claims 4-11 depend from claim 1 and are allowable as depending from an allowable base claim.

Claim 12 as amended recites a system, comprising [added language appears in bold italics]:

- 25 • a web page server unit, *embodied on computer storage media and* configured to provide one or more web pages to one or more client devices over a distributed network;
 • means for receiving client input data;
 • a declarative module, *embodied on computer storage media and* configured to include multiple client input security screens that declare
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- screening rules for client input, wherein the declarative module comprises:
- a global section that includes one or more client input security screens that are applied to all types of client input; and
 - an individual values section that includes one or more client input security screens that are applied to specified types of client input; and
 - a client input security screening unit configured to apply the screening rules for client input to the client input data and to perform one or more actions on invalid client input data, wherein the screening rules are from distinct client input security screens from the global section and the individual values section, and wherein the client input security screening unit is configured to first use the global section to screen one or more client input values and then use the individual values section to screen at least one of said one or more client input values.

In making out the rejection of claim 12, the Board argues that “[c]orresponding features from (claim 1) are recited in the body of system independent claim 12...and the recitation of the network in independent claims 12 and 21 appear to relate to signals per se” (Decision on Appeal, pg. 5). Applicant respectfully disagrees. Nonetheless, in the interest of advancing prosecution, claim 12 has been amended to further emphasize its statutory nature. Support for the amendments can be found in the Specification, among other places on pg. 7, line 20- pg. 8 line 13. For the reasons set forth below, Applicant respectfully requests the rejection be withdrawn.

Applicant respectfully points out that claim 12 recites “a system comprising...one or more client devices”. Clients are described in the Specification, among other places, on pg. 12, lines 21-22. Accordingly, a client device indeed includes statutory hardware structure. Furthermore, this claim

recites “a system comprising...one or more client devices over a distributed network”. A network contains multiple hardware structures, including clients and a server, as described on pg. 6, lines 4-7 of the Specification.

5 Fig. 1 illustrates an exemplary network environment 100. The exemplary network environment 100 includes a server 102 that communicates over the Internet 104 to provide web content to multiple clients 106(1) – 106(n), hereinafter referred to collectively as client(s) 106.

10 The Board is mistaken in asserting that “the network in independent claims 12 and 21 appear to relate to signals per se’. Accordingly, for at least this reason, claim 12 is directed toward statutory subject matter.

Additionally, Applicant has amended claim 12 to recite “a web page server unit, *embodied on computer storage media*” and “a declarative module, *embodied on computer storage media*” to emphasize its statutory nature. Applicant’s Specification describes “computer storage media” on pg. 17, lines 8-16 which is reproduced below for the convenience of the Office.

20 “Computer storage media” includes volatile and non-volatile, removable and non-removable media implemented in any method or technology for storage of information such as computer readable instructions, data structures, program modules, or other data. Computer storage media includes, but is not limited to, RAM, ROM, EEPROM, flash memory or other memory technology, CD-ROM, digital versatile disks (DVD) or other optical storage, magnetic 25 cassettes, magnetic tape, magnetic disk storage or other magnetic storage devices, or any other medium which can be used to store the desired information and which can be accessed by a computer.

Computer storage media, as supported by the Specification, is indeed statutory in nature. Accordingly, for at least these reasons, Applicant respectfully requests that the § 101 rejection be withdrawn.

Claims 16-20 depend from claim 12 and are allowable as depending from

5 an allowable base claim.

Claim 21 recites one or more *computer-readable storage media* containing computer-executable instructions that, when executed on a computer, implement a method comprising [emphasis added]:

- serving a web page to a client over a distributed network;
- receiving client input via the web page;
- comparing the client input with multiple and distinct client input security screens stored in a security declarative module, wherein the security declarative module includes a global section configured to screen all types of client input values and an individual values section configured to screen particular types of client input values, wherein the global section is used to first screen one or more client input values and then the individual values section is used to screen at least one of the one or more client input values;
- if invalid client input is detected, performing a screening action on the invalid client input as indicated by the security declarative module; and
- wherein the client input security screens included in the security declarative module can be applied to multiple web pages.

In making out the rejection of claim 21, the Board argues that “the

25 recitation of the network in independent claims 12 and 21 appear to relate to signals per se” (Decision on Appeal, pg. 5) and ‘the claimed computer-readable media in the preamble of independent claim 21 is directly taught at Specification page 17, line 3 through page 18, line 2 to comprise communication media and thus signal embodiments per se” (Decision on Appeal, pg. 6). Applicant respectfully

disagrees and submits that the Board is mistaken. For the reasons set forth below,
Applicant respectfully requests the rejection be withdrawn.

Claim 21 recites “one or more computer-readable *storage* media containing...instructions that...implement a method comprising: serving a web 5 page to a client over a distributed network”. Clients are described in the Specification, among other places, on pg. 12, lines 21-22. Accordingly, a client indeed includes statutory hardware structure. Furthermore, a network contains multiple hardware structures, including clients and a server as described on pg. 6, lines 4-7 of the Specification. The Board is mistaken in asserting that “the 10 network in independent claims 12 and 21 appear to relate to signals per se”. Accordingly, for at least this reason, claim 21 is directed toward statutory subject matter.

Additionally, Applicant’s claim specifically recites “one or more *computer-readable storage media*” and not “computer readable media” as alleged by the 15 Board. The Specification on pg. 17, lines 5-7 describes that “computer readable media may comprise ‘computer storage media’ and ‘communication media’”. Page 17, line 17-page 18, line 2 of the Specification describes *communication media* as embodying computer readable instructions, data structures, program modules, or other data in a modulated data signal, such as carrier wave or other 20 transport mechanism. Conversely, page 17, lines 8-16 describes *computer storage media* and is reproduced below for the convenience of the Office.

“Computer storage media” includes volatile and non-volatile,

- removable and non-removable media implemented in any method or technology for storage of information such as computer readable instructions, data structures, program modules, or other data.
- 5 Computer storage media includes, but is not limited to, RAM, ROM, EEPROM, flash memory or other memory technology, CD-ROM, digital versatile disks (DVD) or other optical storage, magnetic cassettes, magnetic tape, magnetic disk storage or other magnetic storage devices, or any other medium which can be used to store the desired information and which can be accessed by a computer.
- 10 As claim 21 recites "*computer-readable storage media*" and not "communication media", Applicant respectfully submits that this claim overcomes the Board's rejection and requests the rejection be withdrawn
- Claims 24-28** depend from claim 21 and are allowable as depending from
15 an allowable base claim.

Conclusion

All of the claims are in a condition for allowance. Accordingly, Applicant respectfully requests that the Office issue a Notice of Allowability. If the Office's next anticipated action is to be anything other than issuance of a Notice of

- 5 Allowability, Applicant respectfully requests a telephone call for the purpose of scheduling an interview.

Respectfully submitted,

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